

## EXHIBIT 38

1 ARNAUD PARIS  
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4 IN THE CIRCUIT COURT OF THE STATE OF OREGON  
5 FOR THE COUNTY OF JACKSON

6 In the Matter of:

7 HEIDI MARIE BROWN,

8 Petitioner,

9 and

10 ARNAUD PARIS,

11 Respondent, Pro Per.

Case No. 23CN05721

**MOTION FOR SPECIAL  
APPEARANCE WITHOUT WAIVING  
OBJECTION TO SERVICE AND  
JURISDICTION TO ASK FOR  
DISMISSAL OF THIS ENTIRE  
CONTEMPT CASE OR TO SET ASIDE  
WARRANT FOR RESPONDENT'S  
ARREST AS RELIEF THAT  
PETITIONER WAS SEEKING HAS  
HAPPENED – CHILDREN ARE WITH  
MOTHER IN OREGON AND  
DECLARATION IN SUPPORT**

***ORAL ARGUMENT REQUESTED  
WITH REMOTE APPEARANCE OF  
RESPONDENT WHO IS A PRO PER  
PARTY LIVING IN FRANCE***

18 1. I, Arnaud Paris, Respondent Pro Per in the above-captioned case, moves  
19 this court under a motion for special appearance to set aside the warrant for my arrest  
20 issued by Judge Orr in this matter and to dismiss the entire case under ORCP21 since  
21 the relief that petitioner was seeking in this contempt remedial case has happened:  
22 children are in Oregon with their mother. Also this court had no jurisdiction over  
23 Respondent who was living in France in this matter and service was improperly done.

- 1 -


1           2.     I respectfully request this Honorable Court to allow me to explain remotely  
2 under Special Appearance why this remedial contempt matter has no reason to be  
3 especially since the relief Mother, Petitioner, was seeking was to have the children back  
4 in Oregon and the children are currently with Mother in Oregon.

5           3.     This court also had no jurisdiction over me since I was living in France where  
6 I had returned with the children with the approval of French and US Authorities and I didn't  
7 agree to service by email, the Hague Convention doesn't allow this type of service in  
8 France, which makes service of this contempt case invalid. Therefore, the warrant for my  
9 arrest and the entire contempt case should be dismissed or at the very least the warrant  
10 for my arrest should be set aside as this warrant was part of a remedial case and the  
11 relief thought by Petitioner has already happened. Children are with Mother in Oregon.

12          4.     By filing with the court this motion of special appearance and supporting  
13 declaration I do not waive my right to objecting to jurisdiction or service in this matter. I  
14 hereby declare that the above statement is true to the best of my knowledge and belief,  
15 and that I understand it is made for use as evidence in court and is subject to penalty for  
16 perjury of the laws in the state of Oregon.

17                 Respectfully,

18                 Prepared and efiled on June 5<sup>th</sup> 2024 from Paris.

19  
20  
21 By: 

22 ARNAUD PARIS, Respondent, Pro Per  
23 13 rue Ferdinand Duval, 75004, PARIS, FRANCE  
24 Telephone: +33688283641 - Email: [aparis@sysmicfilms.com](mailto:aparis@sysmicfilms.com)

**CERTIFICATE OF SERVICE**

I hereby certify that I served the foregoing **MOTION FOR SPECIAL APPEARANCE WITHOUT WAIVING OBJECTION TO SERVICE AND JURISDICTION TO ASK FOR DISMISSAL OF THIS ENTIRE CONTEMPT CASE OR TO SET ASIDE WARRANT FOR RESPONDENT'S ARREST AS RELIEF THAT PETITIONER WAS SEEKING HAS HAPPENED – CHILDREN ARE WITH MOTHER IN OREGON AND DECLARATION IN SUPPORT** on the following party:

Heidi Marie Brown  
2256 Abbott Ave  
Ashland, OR 97520  
heidimparis@gmail.com  
Petitioner, Pro Per

By the following method or methods:

☐ by **mailing** full, true, and correct copies thereof in sealed, first class postage prepaid envelopes, addressed to the attorneys(s) as shown above, the last known office address of the attorney(s), and deposited with the United States Postal Service at Portland, Oregon on the date set forth below.

☒ by **emailing** full, true, and correct copies thereof to the to the pro se party at the email address shown above, which is the last known email address for the Petitioner on the date set forth below.

☐ by **faxing** full, true, and correct copies thereof to the attorney(s) at the fax number(s) shown above, which is the last known fax number for the attorney(s) office, on the date set forth below. The receiving fax machines were operating at the time of service and the transmission was properly completed.

☐ by selecting the individual(s) listed above as a service contact when preparing this electronic filing submission, thus causing the individual(s) to be served by means of the **court's electronic filing system**.

Prepared in Paris, France on June 5th, 2024



By:                       
ARNAUD PARIS, Respondent Pro Per  
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